## BEFORE THE ALABAMA COURT OF THE JUDICIARY

IN THE MATTER OF:

STATE OF ALABAMA JUDICIAL INQUIRY
COMMISSION

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COURT OF THE JUDICIARY
Rebecca C. Oates
Secretary

THE HONORABLE TRACIE A. TODD
CIRCUIT JUDGE, BIRMINGHAM DIVISION.

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Case # 58

## MOTION FOR FUNDS FOR EXPERT ETHICS AND DEATH PENALTY LITIGATION ANALYSIS

CRIMINAL DIVISION, JEFFERSON COUNTY, ALABAMA

Comes now Judge Tracie A. Todd (the Defendant), and moves this Court to grant funds to secure the services of an expert ethics and death penalty litigation analysis. The allegations as presented by the Commission are legal issues of first impression and involve arcane questions of ethical and death penalty litigation considerations. To prepare an adequate defense said experts will be necessary for a fair trial, and a pre-determination that these funds will not be taxed to the Defendant notwithstanding the outcome of these proceedings, commensurate with the resources afforded both state funded agencies bringing this prosecution.

Respectfully submitted by Counsel for Judge Todd:

/s/ William Pompey Pompey & Pompey, P.C. P.O. Box 189 Camden, Alabama 36726 (334) 682-9032 We hereby certify that we have on this 31st day of August, 2021electronically filed the foregoing with the Court of the Judiciary, and that we have further served a copy by placing the same in the U.S. mail postage pre-paid, and properly addressed as follows:

Rosa H. Davis Attorney for the Commission Alabama Judicial Inquiry Commission P. 0. Box 303400 Montgomery, Alabama 36130-3400

Respectfully Submitted,

/s/ William Pompey Pompey & Pompey, P.C. P.O. Box 189 Camden, Alabama 36726 (334) 682-9032